

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROBYNN EUROPE,

Plaintiff,

-against-

EQUINOX HOLDINGS, INC. d/b/a EQUINOX
FITNESS CLUB, EQUINOX EAST 92nd
STREET, INC., JOSE TAVERAS, *individually*,
CHRISTOPHER MALTMAN, *individually*, and
ADAM GECHT, *individually*,

Defendants.

Case No.: 1:20-cv-07787 (JGK)

**PROPOSED DISCOVERY PLAN
PURSUANT TO RULE 26(f)**

Plaintiff Robynn Europe and Defendants Equinox Holdings, Inc. d/b/a Equinox Fitness Club (“EHI”), Equinox East 92nd Street, Inc., Adam Gecht and Christopher Maltman (collectively, “Defendants”), by and through their undersigned counsel, jointly submit this report pursuant to Rule 26(f) of the Federal Rules of Civil Procedure:

1. Timing, Form, Requirement for Disclosures:

- (a) The requirement to make Initial Disclosures pursuant to Fed. R. Civ. P. 26(a)(1) was superseded by the Court’s Pilot Project Regarding Initial Discovery Protocols for Employment Cases Alleging Adverse Action (“Initial Discovery Protocols”). The parties shall exchange the documents and information provided for in the Initial Discovery Protocols on or before December 14, 2020; and
- (b) No other changes with respect to the timing, form or requirement for Rule 26(a) disclosures are necessary.

2. Subjects on Which Discovery May Be Needed, Deadlines and Non-Necessity of Phased Discovery:

- (a) The parties anticipate conducting discovery regarding Plaintiff’s employment with

EHI (including the termination of same), complaints lodged by Plaintiff during her employment with EHI, EHI's policies and procedures, and Plaintiff's claims of discrimination and retaliation. In addition, the parties anticipate conducting discovery regarding Plaintiff's claims for monetary and other damages. The foregoing shall not limit any party's right to seek documents and things reasonably calculated to lead to the discovery of admissible evidence;

- (b) The parties shall serve initial discovery requests by 14 days after the conclusion of the Court-Ordered mediation session;
- (c) The parties shall complete all depositions and all fact discovery by May 20, 2021;
- (d) The parties shall complete all expert discovery by July 20, 2021; and
- (e) The parties do not contemplate the necessity of phased discovery.

3. Issues Relating to Electronically Stored Information:

The Parties do not anticipate any issues relating to electronically stored information at this time.

4. Issues Relating to Privilege or other Protections:

The parties do not anticipate any issues relating to privilege or other protections at this time.

5. Changes in Limitations or Additional Limitations to be Imposed:

None at this time.

Respectfully submitted,

CRUMILLER P.C.
16 Court Street, Suite 2500
Brooklyn, NY 11241
Tel. No. (212) 390-8480

/s/ Chloe Liederman
By: _____
Chloe Liederman
Susan K. Crumiller

Dated: November 20, 2020

ATTORNEYS FOR PLAINTIFF

SO ORDERED:

Hon. John G. Koeltl, U.S.D.J.

Dated: _____, 2020
New York, New York

4851-6861-0258, v. 1

JACKSON LEWIS P.C.
666 Third Avenue, 29th Floor
New York, NY 10017
Tel. No. (212) 545-4021

/s/ Jason A. Zoldessy
By: _____
Jason A. Zoldessy
Gregory S. Slotnick

Dated: November 20, 2020

ATTORNEYS FOR DEFENDANTS